



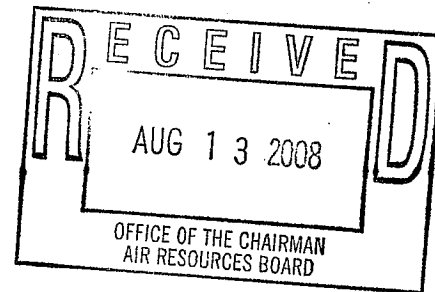
American GI Forum of California

Willie Galvan, State Commander
P. O. Box 1681
Santa Maria, CA 93456-1681

COR 59

August 6, 2008

Ms. Mary Nichols
Chair, California Air Resources Board
1001 I Street
Post Office Box 2815
Sacramento, California 95812



Re: AB 32 Draft Scoping Plan and Appendices

Dear Ms. Nichols:

I am Willie Galvan, State Commander of the American GI Forum of California. The American GI Forum grew out of necessity and has been serving veterans and their families since 1948. The AGIF continues to grow as a symbol of unity and patriotism among a growing nation of immigrants

We have always been concerned about the possible economic impacts of AB 32 on Latino and other minority-owned businesses, and the Draft Scoping Plan did little to alleviate those concerns. The Plan and appendices we have seen so far acknowledge there will be costs, but do not provide realistic or complete economic analyses to give us an idea of how much those costs will be or who will pay them.

The Plan assumes that long-term savings from more efficient technologies will offset many costs. However, significant investments is needed up front before any of these savings can be realized. In addition, whether it is a large utility company spending billions and passing the cost on to ratepayers, or a small business being required to invest capital in so-called green technologies, it is clear there are going to be some serious cost increases in the early years of implementation.

Long-term benefits are only meaningful if you can afford to get through the transition period – the short and the medium term. Frankly, many of our veterans do not have the resources to absorb those higher costs, or make those types of investments. They are more likely to go out of business, or severely reduce their workforces and operations to stay in business, long before the long-term benefits emerge.

We recognize and appreciate that the Plan calls for investments in so-called “disadvantaged” communities, and the development of green jobs. However, specific programs have yet to be defined, and it is unclear how much benefit most veteran-owned businesses and their communities will actually realize.

Individually, a good many veteran-owned businesses are small - sometimes mom and pop operations or modest sized companies - that struggle every day to survive amid rising energy

costs, high taxes and the overall cost of doing business in our state. Nevertheless, combined, with other Hispanic-owned businesses they comprise almost half a million small businesses that make a valuable contribution to our economy as employers, taxpayers and providers of goods and services.

It is critically important that CARB take an honest and objective look at the real costs AB 32 implementation will be imposing on minority-owned and other small businesses, not just over the long term but also on a monthly or annual basis. We do not have the resources to budget or operate any other way, so it is critical to our survival that AB 32 policies be as cost-effective as possible and keep the burdens on small and veteran -owned businesses manageable. We ask you to help ensure that this happens.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Willie Galvan', with a long, sweeping horizontal stroke extending to the right.

Willie Galvan, State Commander
American GI Forum of California